

App. Serial No. 09/851,757  
Docket No.: US018047 US

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Remarks

Claims 1-8 and 26 are currently pending in the patent application. For the reasons and arguments set forth below, Applicant respectfully submits that the claimed invention is allowable over the cited references.

The non-final Office Action dated June 2, 2006 indicated an objection to Figure 1A, an objection to the specification because of a spelling error, a renumbering of claim 3(b) to claim 26, and listed the following rejections: claims 2-8 stand rejected under 35 U.S.C. § 112(2) as being indefinite; claim 1 stands rejected under 35 U.S.C. § 102(b) over *alleged* admitted prior art (APA); claims 1-7 and 26 stand rejected under 35 U.S.C. § 102(b) over Frielink (U.S. 4,926,173); and claim 8 stands rejected under 35 U.S.C. § 103(a) over Frielink in view of Valdenaire (U.S. 5,677,687).

Regarding the objection to Figure 1A, Applicant has added a legend to Fig. 1A indicating that it is prior art and, as such, requests that the objection be removed.

Applicant appreciates the examiner's careful attention to the specification, and has made the indicated typographical correction (see, e.g., Office Action, paragraph 4), as well as other minor corrections to the specification as presented in the preceding pages of this response. The amendments are not being made to overcome any issues of patentability raised by the rejections in the Office Action. Accordingly, Applicant requests that the objection to the specification be removed.

Applicant acknowledges that claim "3(b)" has been renumbered as claim 26.

Applicant respectfully traverses the Section 112(2) rejections of claims 2-8 and 26. Under MPEP, §2173.05, word-for-word antecedent basis is not required and, also, the failure to provide explicit antecedent basis for terms does not always render a claim indefinite. Moreover, regarding claims 3 and 26, explicit antecedent bases for the cited limitations are found in claim 1 at lines 2 and 4 (e.g., "a keypad strong driver signal on a column" and "a keypad strong driver signal on a row" respectfully). Notwithstanding, in an effort to facilitate prosecution, Applicant has amended claims 1-4, 8 and 26 to more particularly point out and distinctly claim the subject matter of the claimed invention. Specifically, Applicant has amended: claim 1 to clarify what signals the comparator is adapted to perform a bit wise comparison of, claim 2 to clarify that "overtime" is over time, claim 3 to clarify that a set of digital values is not referring to claim 2, claims 3, 6-7 and 26 to clarify that antecedent basis for

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said strong driver signal on a column and said strong driver signal on a row are found in claim 1, claims 4 and 26 to provide antecedent basis for a register file, claim 4 to remove the term significant, and claim 8 to clarify that the second said programmable "column" word constructor refers to said programmable row word constructor of claim 1. Applicant notes that the amendments are not being made to overcome any issues of patentability raised by the rejections in the Office Action. The claims are patently distinguishable over the cited references for the reasons discussed below, and are fully supported by the original disclosure. Therefore, Applicant requests that the Section 112(2) rejections be withdrawn.

Applicant respectfully traverses the Section 102(b) rejections of claims 1-7 and 26, because the cited portions of the Frielink reference and the alleged APA fail to correspond to all of the claimed limitations. Applicant's alleged APA cited by the Office Action fails to correspond to numerous limitations of claim 1. The Office Action does not present correspondence between the claimed invention and the asserted APA. For example, neither the Office Action nor the background evidences the asserted APA having a comparator for a bit wise comparison of a driver and a resulting signal, a programmable column word constructor coupled to the row output driver, or a programmable row word constructor coupled to the column output driver as in the claimed invention. Accordingly, the Section 102(b) rejection of claim 1 based on the alleged APA is improper and Applicant requests that it be withdrawn.

Regarding the Section 102(b) rejections based upon the Frielink reference, the Office Action fails to cite any portion of Frielink that corresponds to claim 1 limitations directed to a comparator adapted to perform a bit-wise comparison of the resulting signal and at least one of the driver signals. The Office Action cites to portions of the Frielink reference that teach a keyboard (i.e., col. 1, lines 36-41 and col. 2, lines 53-68); however, the cited parts of Frielink do not mention a comparator. The Frielink reference also does not teach or suggest using a comparator to perform a bit wise comparison of the resulting signal and at least one of the driver signals as in the claimed invention. Moreover, the Office Action does not cite to any portion of the Frielink reference that corresponds to claimed limitations directed towards a programmable column word constructor adapted to provide a weak driver signal on a column and a programmable row word constructor adapted to provide a weak driver signal on a row. Therefore, the Section 102(b) rejections of claim 1 and claims 2-7 and 26

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(which depend from claim 1) based upon the Frielink reference are improper and Applicant requests that they be withdrawn.

Furthermore, the cited portions of the Frielink reference fail to correspond to the claim 2 limitations directed to a set of digital values randomly varies over the bits used to feed at least one of the driver signals and the claim 3 limitations directed to a set of random digital values are sequentially sent to the columns and rows as the strong driver signals. The Frielink reference teaches that random pattern generator 30 generates successive binary bit patterns that are used to generate false key press signals in response to an actual key press (see, e.g., col. 4, lines 13-63), not that the random digital values are the actual driver signals as in claims 2 and 3 of the claimed invention.

Moreover, the cited portions of the Frielink reference further fail to correspond to claim 3 and claim 26 limitations directed to the set of random digital values is from a register file. While the Office Action cites the output lines 40 and 42 of the random pattern generator 30 (see, e.g., col. 3, lines 25-30), this citation does not corresponds to a register file as in claims 3 and 26 of the claimed invention. Therefore, the Section 102(b) rejections of dependent claims 2, 3 and 26 are improper because the cited portions of the Frielink reference fail to correspond to all of the claimed limitations. Accordingly, the rejections should be withdrawn.

Applicant traverses the Section 103(a) rejection of claim 8, because the cited portions of the Frielink reference do not correspond to the claimed limitations as discussed above in connection with the Section 102(b) rejection of claim 1. In this regard, the rejection of claim 8 is improper because claim 8 depends from claim 1. The corresponding rejection thus relies upon the same (improper) rationale. Therefore, Applicant requests that the Section 103(a) rejection of claim 8 be withdrawn.

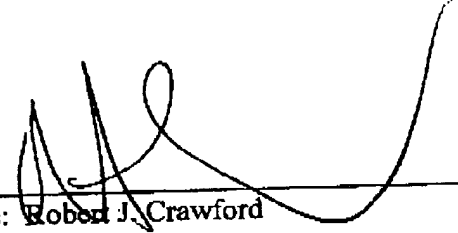
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In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of Philips Corporation at (408) 474-9063.

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